

To: Tuers, Charis[ctuers@blm.gov]
Cc: Jackson, Scott[Jackson.Scott@epa.gov]; Hestmark, Martin[Hestmark.Martin@epa.gov]; Daly, Carl[Daly.Carl@epa.gov]; Morales, Monica[Morales.Monica@epa.gov]; Laumann, Sara[Laumann.Sara@epa.gov]
From: Russ, Timothy
Sent: Wed 2/15/2017 3:33:47 PM
Subject: EPA Comments on the NPL Project's Draft General Conformity Determination (Includes: Permits Used in the Analysis/Determination)
[2013-10-01 Jonah-NPL EDI&M Plan Air Permit MD-13171.pdf](#)
[2015-03-05 Jonah Energy Completion-Recompletion Air Permit MD-16984.pdf](#)
[2015-03-05 Jonah Energy Well Blowdown-Venting Air Permit CDA MD-16985.pdf](#)
[2016-03-31 Jonah-NPL Drill Rig Fleet Air Permit P0020602.pdf](#)
[2016-07-06 - Stud Horse Butte 84-09 CDP Air Permit P0020957.pdf](#)
[BLM-WY NPL Project Emission Inv 4-28-14 for Gen Conformity 07-16-2015.xlsx](#)
[WDEQ 2008 Interim Policy UGRB.pdf](#)
[Staff-to-Staff EPA Comments NPL Project General Conformity Dated-2-15-17.docx](#)

Hi Charis,

Please find attached our staff-to-staff comments (Word file entitled "Staff-to-Staff_EPA_Comments_NPL_Project_General_Conformity_Dated-2-15-17") regarding the BLM's draft general conformity analysis and determination for the NPL Project. Our comments, labeled as "Enclosure 1," focus on the five permits (copies attached) that the BLM provided via an email on October 14, 2016. Also provided for reference, as "Enclosure 2," is the BLM's draft general conformity document. We also evaluated the associated Excel spreadsheet, for the general conformity analysis, that the BLM provided via an email dated September 21, 2016. Finally, we have provided a copy of the State's 2008 Interim Policy which we used as a reference for our review.

Thank you for the opportunity to review the draft NPL Project's general conformity analysis and determination. Please let me know if you have any questions and too, if you would like to arrange a subsequent discussion of our comments.

Tim

Tim Russ
Environmental Scientist
USEPA Region 8
Air Program
1595 Wynkoop Street (8P-AR)
Denver, CO 80202-1129

Ph. (303) 312-6479
Fax (303) 312-6064
e-mail: russ.tim@epa.gov